

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re)	Chapter 7
)	
Zane D. Bussler,)	Case No. 15-28948
)	
Debtor.)	Hon. Timothy A. Barnes
)	Hearing Date: July 26, 2016
)	Hearing Time: 10:30 a.m.

**COVER SHEET FOR APPLICATION FOR
PROFESSIONAL COMPENSATION**

Name of Applicant: Baldi Berg, Ltd.

Authorized to Provide
Professional Services to: Joseph A. Baldi, Trustee

Date of Order Authorizing
Employment: January 27, 2016

Period for Which
Compensation is sought: December 22, 2015 to the close of case

Amount of Fees sought: \$3,121.50

Amount of Expense
Reimbursement sought: \$219.66

This is an: Interim Application ☐ Final Application ☒

If this is not the first application filed herein by this professional, disclose as to all prior fee applications:

<u>Date Filed</u>	<u>Period Covered</u>	<u>Total Requested (Fees & Expenses)</u>	<u>Total Allowed</u>
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Not Applicable

The aggregate amount of fees and expenses paid to the Applicant to date for services rendered and expenses incurred herein is: \$ -0-.

Dated: June 29, 2016

Baldi Berg, Ltd.

By: /s/Joseph A. Baldi
Joseph A. Baldi

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re)	Chapter 7
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Zane D. Bussler,)	Case No. 15-28948
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Debtor.)	Hon. Timothy A. Barnes
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**Application for Allowance and Payment of Final Compensation and Expense
Reimbursement of Baldi Berg, Ltd., Attorneys for Trustee**

Baldi Berg, Ltd. ("BB"), attorneys for Joseph A. Baldi, as chapter 7 trustee ("Trustee") of the bankruptcy estate ("Estate") of Zane D. Bussler, debtor ("Debtor"), pursuant to section 330 of title 11, United States Code ("Code"), request this Court to enter an order for the allowance and payment to BB of \$3,121.50, as final compensation for 12.90 hours of legal services rendered to the Trustee from December 22, 2015 through the close of this case and for reimbursement of actual expenses incurred in the amount of \$219.66. In support thereof, BB respectfully states as follows:

Introduction

1. Debtor commenced this case on August 25, 2015 by filing a voluntary petition for relief under chapter 7 of the Code.
2. Joseph A. Baldi is the duly appointed, qualified and acting chapter 7 trustee in this case.
3. The Estate's primary assets of value consisted of the Debtor's interest in two insurance policies, a Princecraft Pontoon Boat, and business interests in Bussler & Associates, LLC, Winchester Boat Works, Inc., NBD Transportation, Inc., and Stateline Lake Associates, LLC (collectively the "Property").
4. The bar date for filing claims in this case was March 31, 2016 for general unsecured creditors and governmental units.

Retention of Baldi Berg, Ltd.

5. On January 27, 2016, the Court entered an ordered authorizing Trustee to employ

Joseph A. Baldi and the law firm of Baldi Berg, Ltd. as his counsel in this case. A copy of the order authorizing Trustee to retain BB is attached hereto as Exhibit A. Also attached as Exhibit A is an order amending the original employment order to include an effective date. BB has served as counsel for Trustee at all times since its retention.

6. The professional qualifications and experience of the BB attorneys who have performed substantial legal services for the Trustee during the period covered by this Application are set forth in Exhibit B. A listing of the attorneys, paralegals and clerks who were responsible for representing the Trustee during the period covered by this fee application, their position with the firm, hourly rate(s) as adjusted from time to time, and the total hours expended by each professional is detailed below:

PROFESSIONAL	TITLE	RATE	HOURS	FEES
Joseph A. Baldi	Principal	\$450.00	2.4	\$1,080.00
Julia D. Loper	Associate	\$275.00	1.1	\$ 302.50
Jason M. Manola	Paralegal	\$175.00	9.4	\$1,739.00
TOTALS			12.9	\$3,121.50

Prior Compensation Received

7. This is the first and final application ("Application") for allowance and payment of compensation that BB will file in this case.

Services Rendered by Baldi Berg, Ltd.

8. Itemized and detailed descriptions of the specific services rendered by BB to the Trustee for which compensation is sought in this Application are reflected on the billing statements attached hereto as Exhibit C. The billing statements set forth the name of each attorney or paralegal, the amount of time spent rendering each service, the date on which each service was rendered, a description of the service rendered and the total number of hours of services rendered by each attorney or paralegal in each category.

9. The services rendered by BB during the period covered by this Application are

summarized below:

BB represented the Trustee with respect to general case administration including the recovery and liquidation of the Debtor's property and the preparation and presentation of various motions filed with the Court. The Debtor listed an interest in two insurance policies, a Princecraft Pontoon Boat, and a business interest in Bussler & Associates, LLC ("B&A"), Winchester Boat Works, Inc. ("WBW"), NBD Transportation, Inc. ("NBD"), and Stateline Lake Associates, LLC ("SLA") (collectively the "Property"). After analyzing the debtor's interest in the Property and after receipt of a settlement offer from the Debtor, BB assisted the Trustee in successful settlement agreement with the Debtor. BB prepared and presented the Trustee's Motion to Sell Property Under 363(b) which was granted by this Court on January 27, 2016. After receiving the settlement agreement funds, BB prepared the Trustee's Report of Sale as required by Rule 6004. Finally, BB prepared this final fee application.

In connection with the foregoing services, BB expended 12.90 hours of service on behalf of the Trustee for which it now requests compensation in the amount of \$3,121.50.

Compensation Requested

10. BB has expended a total of 12.90 hours for the services described and categorized in paragraph 9 above. The total value of and the amount of compensation requested herein for those services is \$3,121.50.

11. All of the services performed by BB were required for proper representation of the Trustee in this case, were authorized by this Court and were performed by BB at the request and direction of the Trustee. Pursuant to Section 330 of the Code and the generally applicable criteria with respect to the nature, extent and value of the services performed, all of BB's services are compensable and the compensation requested herein is fair and reasonable. There has been no duplication of services rendered to the Trustee by BB for which compensation is requested. In those instances where two or more professionals participated in any matter, such joint participation

was necessary due to the complexity of the problems involved.

12. The rates charged by the attorneys and paralegals of BB in this Application are their usual and customary hourly rates charged during the period covered by this Application for work performed for other clients in both bankruptcy and non-bankruptcy matters. A list of each person who performed services for the Trustee and their hourly rate is contained in the billing statements attached hereto as Exhibit C and is summarized on the table in paragraph 6 above.

Reimbursement of Expenses

13. In connection with the services rendered, BB incurred actual and necessary expenses in the amount of \$219.66. The expenses incurred by BB were for copies and postage in regards to the Motions BB prepared and presented as well as the filing fee for the Motion to Sell Property Under 363(b). An itemized list of the expenses incurred is included within the billing statements attached hereto as Exhibit C.

Payment of Compensation

14. BB has not entered into any agreement or understanding of any kind, express or implied, with any other entity to share any compensation to be received by BB for services rendered to the Trustee in connection with this case.

15. BB has not previously received or been promised any payments for services rendered in this case.

16. The Affidavit of Joseph A Baldi pursuant to Rule 2016 of the Federal Rules of Bankruptcy Procedure is attached hereto as Exhibit D and made a part hereof.

17. The proposed source for payment of the compensation requested in this Application are the Estate funds in the Trustee's possession, collected by him during his administration of this case. BB requests that the Trustee be authorized to pay the compensation awarded herein as part of the Trustee's final distribution in this case.

Status of the Case

18. The Trustee has administered all of the assets belonging to this Estate and completed his review and analysis of the claims filed against the Estate.

19. Trustee has completed and filed his Final Report simultaneously herewith. A Final Fee Application for the Trustee has also been filed concurrently with this Application.

Financial Condition of the Case

20 Trustee currently has \$24,949.68 on deposit in the Estate's bank accounts. The Chapter 7 administrative expenses that are currently owing and those the Trustee anticipates the Estate will incur prior to the closing of this case include 1) the fees allowed to Trustee in connection with his final fee application, 2) the legal fees allowed to Baldi Berg, Ltd. in connection with this final fee application, and 3) any fees which may be due or outstanding to the offices of the United States Trustee and the Clerk of the United States Bankruptcy Court.

21. Following payment of all Chapter 7 administrative expenses set forth above, Trustee estimates there will be funds available to make a partial distribution to general unsecured creditors with timely filed claims.

Trustee's Approval

22. BB certifies that the Trustee has received, reviewed and approved this Application.

WHEREFORE, Baldi Berg, Ltd., attorneys for Joseph A. Baldi, as trustee, requests the entry of an order providing the following:

A. Allowing to Baldi Berg, Ltd. final compensation in the amount of \$3,121.50 for actual and necessary professional services rendered to the Trustee from December 22, 2015 through the closing of this case;

B. Allowing to Baldi Berg, Ltd. reimbursement of actual expenses incurred in the amount of \$219.66;

C. Authorizing the Trustee to pay the compensation awarded herein from the funds on

hand in the Estate as part of the Trustee's final distribution in this case; and

C. For such other and further relief as this Court deems appropriate.

Dated: May 26, 2016

Baldi Berg, Ltd.

Attorneys for Joseph A. Baldi, as trustee of the estate
of Zane D. Bussler, debtor

By: /s/
Joseph A. Baldi

Joseph A. Baldi
Baldi Berg, Ltd.
20 N. Clark St., Suite 200
Chicago, IL 60602
312.726.8150

**Baldi Berg, Ltd.
Final Fee Application**

**Zane D. Bussler, Debtor
Case No. 15-28948**

Retention Order

Exhibit A

Document Page 1 of 1
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

In Re:)	BK No.: 15-28948
Zane D. Bussler,)	
)	
)	Chapter: 7
)	Honorable Timothy Barnes
)	
Debtor(s))	

Order Authorizing Trustee to Employ Attorneys

THIS CAUSE comes before this Court on the Trustee's Application To Employ Joseph A. Baldi and the law firm of Baldi Berg, Ltd., as attorneys for Trustee and the supporting affidavit of Joseph A. Baldi and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that Joseph A. Baldi, as trustee of the estate of Zane D. Bussler, debtor, is authorized to employ Joseph A. Baldi and the law firm of Baldi Berg, Ltd., to act as counsel for the Trustee, with compensation and reimbursement of expenses to be paid in such amounts as may be allowed by this Court upon proper application.

Enter:



Honorable Timothy A. Barnes
United States Bankruptcy Judge

Dated: January 27, 2016

Prepared by:

Joseph A. Baldi
Baldi Berg, Ltd
20 N. Clark Street, Suite 200
Chicago, IL 60602
(312) 726-8150

Document Page 1 of 1
UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
Eastern Division

In Re:)	BK No.: 15-28948
Zane D. Bussler,)	
)	
)	Chapter: 7
)	Honorable Timothy Barnes
)	
Debtor(s))	

Amended Order Authorizing Trustee to Employ Attorneys

THIS CAUSE comes before this Court on the Trustee's Application To Employ Joseph A. Baldi and the law firm of Baldi Berg, Ltd., as attorneys for Trustee and the supporting affidavit of Joseph A. Baldi and the Court being fully advised in the premises:

IT IS HEREBY ORDERED that Joseph A. Baldi, as trustee of the estate of Zane D. Bussler, debtor, is authorized to employ Joseph A. Baldi and the law firm of Baldi Berg, Ltd., to act as counsel for the Trustee, effective December 22, 2015, with compensation and expense reimbursement to be paid in such amounts as may be allowed by this Court upon proper application.

Enter:



Honorable Timothy A. Barnes
United States Bankruptcy Judge

Dated: May 17, 2016

Prepared by:

Joseph A. Baldi
Baldi Berg, Ltd.
20 N. Clark St., Suite 200
Chicago, IL 60602
(312) 726-8150

**Baldi Berg, Ltd.
Final Fee Application**

**Zane D. Bussler, Debtor
Case No. 15-28948**

Professional Qualifications

Exhibit B

Baldi Berg, Ltd.

Joseph A. Baldi

Joseph Baldi is the founding member of the Chicago bankruptcy boutique firm of Baldi Berg, Ltd. (formerly Baldi Berg & Wallace, Ltd.). Prior to establishing the firm in 2000, Mr. Baldi was a partner in the Chicago law firms of Schwartz & Freeman and Rosenthal and Schanfield, P.C., where he served as chairman of bankruptcy and reorganization practice group. In addition to his experience in private practice, Mr. Baldi spent five years as a staff attorney with the Office of the United States Trustee, a component of the United States Department of Justice.

Mr. Baldi has specialized in insolvency law for over 25 years and has extensive experience in a variety of settings, including bankruptcies, workouts, receiverships and assignments for the benefit of creditors. He has represented clients in all sectors of the bankruptcy arena, including debtors, bankruptcy trustees, lenders, claimholders and creditor committees. Mr. Baldi has counseled both individual and corporate debtors in chapter 7, 11, and 13 cases and has significant experience with complex commercial bankruptcies.

In addition to his experience acting as bankruptcy counsel, Mr. Baldi is a long time member of the panel of private bankruptcy trustees appointed by the United States Trustee's Office for the Northern District of Illinois. In over twenty years as a chapter 7 trustee, Mr. Baldi has liquidated a broad range of business entities, including law firms, real estate ventures, distributorships, retail firms and financial service providers. He has also operated numerous businesses as a chapter 11 trustee, including an aluminum manufacturing facility, a steel mini-mill, and an industrial real estate partnership.

Mr. Baldi is licensed to practice law in the state of Illinois and admitted to practice before the Seventh Circuit Court of Appeals and many federal bankruptcy courts in the Midwest. He is a member of the National Association of Bankruptcy Trustees and American Bankruptcy Institute, where he is a frequent lecturer on a variety of bankruptcy topics.

In addition to his legal pursuits, Mr. Baldi is active in municipal affairs in his hometown of Park Ridge, Illinois and currently serves as a commissioner on the city's Planning and Zoning Commission. Mr. Baldi graduated *cum laude* from the DePaul University College of Law and holds a B.A. in Psychology from Western Illinois University.

Baldi Berg, Ltd.

Julia D. Loper

Julia D. Loper is an associate with the firm and represents bankruptcy trustees and debtors in chapter 7, chapter 11, and chapter 13 bankruptcies. Ms. Loper has worked with Baldi Berg, Ltd. since 2009. Ms. Loper also has general civil litigation experience. Ms. Loper is admitted to practice in the State of Illinois and the United States District Court for the Northern District of Illinois. She is a member of the Chicago Bar Association. Ms. Loper received her Juris Doctor from Michigan State College of Law and received her Bachelor of Arts degree from University of Utah in Psychology and Gender Studies.

Jason M. Manola

Jason M. Manola is a Paralegal with the firm. Mr. Manola has worked with Baldi Berg, Ltd. since 2011. He is a member of the Chicago Bar Association, DuPage County Bar Association, and the Sports Lawyers Association. Mr. Manola is currently pursuing his Paralegal Certificate at the College of DuPage in Glen Ellyn, Illinois. Mr. Manola received his Bachelor of Arts degree from the University of Iowa in Sports Management and Entrepreneurship.

Baldi Berg, Ltd.
Final Fee Application

Zane D. Bussler, Debtor
Case No. 15-28948

Billing Statements

Exhibit C

Baldi Berg, Ltd.
20 N. Clark Street
Suite 200
Chicago, IL 60602

Phone: (312) 726-8150

Fax: (312) 470-6323

FEIN: 36-4352753

Invoice submitted to:

May 26, 2016

Invoice No: 02707

Joseph A. Baldi, trustee
 Baldi Berg, Ltd
 20 N. Clark Street, Suite 200
 Chicago, IL 60602

In Reference to: *Bussler - General Administration***Professional Services**

<u>Date</u>	<u>Staff</u>	<u>Description</u>	<u>Hours</u>	<u>Charges</u>
12/22/2015	JAB	Review Letter from Debtor's Counsel re: settlement offer (.2), Review and analyze Bussler & Associates Profit & Loss Statement, Balance Sheet, Bank Account Statements, Corporate Tax Return (.5), Review and analyze NBD Transportation Balance Sheet, Corporate Tax Return (.3), Review and analyze Winchester Boat Works Profit & Loss, Balance Sheet, Corporate Tax Return (.3), Review information on insurance policies (.2), Draft response email to Debtor's Counsel re: Agreement on Settlement Offer (.3)	1.80 \$450.00/ hr	\$810.00
12/22/2015	JMM	Draft Motion to Employ Attorneys (.9), Affidavit (.1), Proposed Order (.1), Begin drafting Motion to Sell Personal Property back to Debtor (.6)	1.70 \$185.00/ hr	\$314.50
12/29/2015	JMM	Edit Motion to Sell Personal Property Back to Debtor (1.2)	1.20 \$185.00/ hr	\$222.00
1/05/2016	JAB	Review and revise motion to approve sale of personal property to Debtor, confer with JMM re follow up.	0.60 \$450.00/ hr	\$270.00
1/05/2016	JMM	Edit Trustee's Motion to Sell with JAB's revisions (1.3), Draft 2002 Notice (.9), Draft Proposed Order (.1), Edit Motion to Employ Attorneys (.4), Draft Order (.1),	2.80 \$185.00/ hr	\$518.00

Baldi Berg, Ltd

5/26/2016

Bussler - General Administration

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Prepare envelopes and serve Rule 2002 Notice to 66 parties (.8)

1/27/2016	JDL	Review motions to employ attorneys and motion to sell in preparation for court appearance (.3) Appear in court on same (.8)	1.10 \$275.00/ hr	\$302.50
4/19/2016	JMM	Compile and review information needed for drafting of Trustee's Report of Sale (.1), Draft Report of Sale for Assets sold back to Debtor (.9)	1.00 \$185.00/ hr	\$185.00
4/20/2016	JMM	Edit Trustee's Report of Sale (.2)	0.20 \$185.00/ hr	\$37.00
5/18/2016	JMM	Prepare BB Fee Application (1.6), Prepare coversheet, proposed order, affidavit (.3)	1.90 \$185.00/ hr	\$351.50
5/26/2016	JMM	Edit BB Fee Application w/ JAB revisions (.6)	0.60 \$185.00/ hr	\$111.00
Total Fees				\$3,121.50

Expenses

Start Date	Description	Quantity	Charges
1/05/2016	Motion to Employ Attorneys (4 pgs x \$.10 = \$0.40 x 1 party = \$0.40) + Motion to Sell Estate's Interest to Debtor (5 pgs x \$0.10 = \$0.50 x 4 parties = \$2.00) + Rule 2002 Notice (1 pg x \$0.10 x 66 parties = \$6.60) = \$9.00	1.00 @ /each	\$9.00
1/05/2016	Motion to Employ & Motion to Sell Sent to Debtor (\$0.71) + Motion to Sell (\$0.485 x 4 parties = \$1.94) + Rule 2002 Notice (\$0.485 x 66 parties = \$32.01) = \$34.66	1.00 @ /each	\$34.66
1/26/2016	TRs Sale Motion	1.00 @ /each	\$176.00
Total Expenses			\$219.66

Baldi Berg, Ltd

5/26/2016

Bussler - General Administration

Page 3

Total New Charges	\$3,341.16
Previous Balance	\$0.00
Balance Due	<u>\$3,341.16</u>

Timekeeper Summary

<u>Name</u>	<u>Hours</u>	<u>Rate</u>
Joseph A Baldi	2.40	\$450.00
Julia D Loper	1.10	\$275.00
Jason M Manola	9.40	\$185.00
	<u>12.90</u>	

**Baldi Berg, Ltd.
Final Fee Application**

**Zane D. Bussler, Debtor
Case No. 15-28948**

Rule 2016 Affidavit

Exhibit D

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

In re)	Chapter 7
)	
Zane D. Bussler,)	Case No. 15-28948
)	
Debtor.)	Hon. Timothy A. Barnes

Rule 2016 Affidavit

State of Illinois)
County of Cook)

I, Joseph A. Baldi, being first duly sworn upon oath, do depose and state as follows:

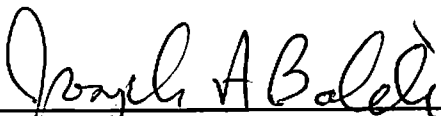
1. I am a principal of Baldi Berg, Ltd. and am authorized to execute this affidavit on behalf of Baldi Berg, Ltd.

2. I have read the First and Final Application for Allowance and Payment of Compensation and Expense Reimbursement of Baldi Berg, Ltd., Attorneys for Trustee ("Application") and all of the factual matters set forth therein are true to the best of my knowledge, information and belief. Baldi Berg, Ltd. has performed the services set forth and described in the Application at the request and pursuant to the direction of the Trustee.

3. A copy of the Application has been provided to Trustee and the Trustee has reviewed and approved the Application.

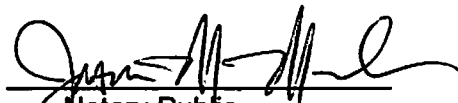
4. Baldi Berg, Ltd. has not previously received payment of any compensation for services rendered in connection with this case. Baldi Berg, Ltd. has not entered into any agreement with any other person or persons for the sharing of compensation to be received for services rendered in connection with this matter, except among the principals and associates of Baldi Berg, Ltd.

5. Further affiant sayeth naught.



Joseph A. Baldi

Subscribed and Sworn to before me
this 27 day of May, 2016



Notary Public

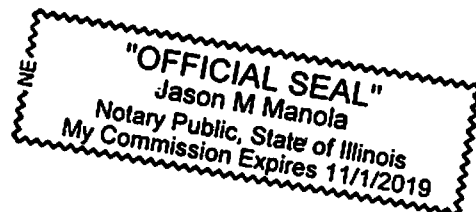


Exhibit D